

EXHIBIT B

From: [Snyder, Orin](#)
To: [Francisco, Michael](#)
Cc: [Kremer, Paul J.](#); [Terwilliger, George J. III](#); [Ahmad, Zainab](#); [Weiss, Samantha](#); [Spears, Brooks H.](#)
Subject: Re: Broidy v. GRA, 19-cv-11861 (SDNY)
Date: Tuesday, June 1, 2021 2:49:06 PM

****EXTERNAL EMAIL; use caution with links and attachments****

There is no good faith basis to seek leave to amend. This case is a sham and has been from the outset. We will vigorously oppose any motion to amend and reserve the right to seek sanctions, including sanctions and attorney's fees under Rule 11, 28 USC 1927 and the court's inherent power. Guide your conduct accordingly.

On Jun 1, 2021, at 11:54 AM, Francisco, Michael <MFrancisco@mcguirewoods.com> wrote:

[External Email]

Orin,

We will be filing a motion for leave to amend the complaint in this case later today. (And Jason Cowley from our firm will also be withdrawing from the case; he is in trial and the other attorneys are the firm are handling this matter at this time.)

I now understand that a meet and confer is not required in this circumstance under the local rules. However, in an abundance of caution, I may have indicated previously that we would confer before filing.

If you would like, I am available to discuss at your convenience today before 4:00. Please note, however, we are mindful of your previous comments on a potential complaint, in the letter and in our phone call. We fully intend to file and strongly believe in the good faith basis to do so. No doubt your client will oppose the effort to amend the complaint; and that can all be litigated in due course.

Regards,
Michael

Michael Francisco

Partner

Not admitted in DC; admitted in CO. Application for admission to the DC bar filed; working under the direct supervision of an enrolled, active member of the DC bar

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